

<b>UNITED STATES BANKRUPTCY COURT</b> <b>DISTRICT OF NEW JERSEY</b> <b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b>	
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<p>In re:</p> <p><b>BLOCKFI INC., et al.,</b></p> <p style="text-align: right;">Debtors.<sup>1</sup></p>	<p>Chapter 11</p> <p>Case No. 22-19361 (MBK)</p> <p>Jointly Administered</p>

<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 100 Horizon Center Blvd., 1<sup>st</sup> and 2<sup>nd</sup> Floors, Hamilton, NJ 08691.

**AMENDED NOTICE OF CROSS-MOTION OF THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR AN ORDER (A) APPOINTING A CHAPTER 11  
TRUSTEE, (B) TERMINATING THE DEBTORS' EXCLUSIVITY PERIODS OR,  
ALTERNATIVELY, (C) CONVERTING THESE CASES TO CHAPTER 7  
PROCEEDINGS, AND (D) FOR OTHER RELATED RELIEF**

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**PLEASE TAKE NOTICE** that the Official Committee of Unsecured Creditors (the “**Committee**”) in the above-captioned case of BlockFi, Inc. and its affiliated debtors (collectively, the “**Debtors**” or “**BlockFi**”), by and through the Committee’s counsel, shall cross-move (the “**Cross-Motion**”) before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8, to the *Debtors’ Second Motion for Entry of an Order (I) Extending the Debtors’ Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code and (II) Granting Related Relief* [Docket No. 886] (the “**Debtors’ Exclusivity Motion**”), which is currently scheduled to be heard on **July 13, 2023 at 10:00 a.m.** (prevailing Eastern Time)<sup>2</sup> (the “**Hearing Date**”).

**PLEASE TAKE FURTHER NOTICE** that, the Committee shall rely upon the combined *Objection of the Official Committee of Unsecured Creditors to Debtors’ Second Motion to Extend Exclusivity and Cross-Motion of the Official Committee of Unsecured Creditors for an Order (A) Appointing a Chapter 11 Trustee, (B) Terminating The Debtors’ Exclusivity Periods or, Alternatively, (C) Converting These Cases to Chapter 7 Proceedings, and (D) for Other Related*

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<sup>2</sup> See Notice of Amended Disclosure Statement and Exclusivity Hearing Date and Objection Deadlines filed by the Debtors on June 17, 2023 [Docket No. 1089].

*Relief* (the “**Supporting Pleading**”) filed herewith in support of the relief sought by the Cross-Motion, and that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the Supporting Pleading.

**PLEASE TAKE FURTHER NOTICE** that, oral argument is requested, unless the Court directs that no oral argument would be necessary.

**PLEASE TAKE FURTHER NOTICE**, that all objections, if any, must be made in accordance with the Local Rules of this Court which are located here: [Microsoft Word - Local Rules Package 8-1-21 final.docx \(uscourts.gov\)](#). In accordance with D.N.J. LBR 9013-2(a)(2), written objections to the Cross-Motion shall be filed with the Clerk of the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, and a copy thereof must simultaneously be served upon GENOVA BURNS, LLC., Attn: Daniel M. Stolz, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920, so they are received by no later than four (4) days<sup>3</sup> before the Hearing Date.

**PLEASE TAKE FURTHER NOTICE** that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Dated: June 28, 2023

**GENOVA BURNS LLC**

By: /s/ Donald W. Clarke

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Committee of Talc Claimants*

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<sup>3</sup> Notice has been amended to reflect the correct objection deadline of four (4) days prior to the hearing.